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Attorneys for Defendants Charles Glover (sued as
Charles Mack) and M & A Trucking, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

YOUNG SU CHOI,	:	
	:	
Plaintiff,	:	
	:	No. 2:22-cv-2623
v.	:	
	:	
CHARLES MACK, M&A TRUCKING LLC	:	
JOHN DOES 1-10, (names unknown and	:	
therefore fictitious), ABC Corp. 1-10	:	
(names unknown and therefore fictitious),	:	
	:	
Defendants.	:	
	:	

NOTICE OF REMOVAL

Defendants Charles Glover (sued as Charles Mack), whose address is 4981 Lilac Lane, Crisfield, Maryland 21817, and M & A Trucking, LLC, whose address is 1207 Caleb's Way, Salisbury, Maryland 21804, remove this action, which has been bought by plaintiff Young Su Choi, whose address is 232 East Central Boulevard, Palisades Park, New Jersey 07650, from the Superior Court of the State of New Jersey, Bergen County to the United States District Court for the District of New Jersey.

1. The plaintiff commenced this action against Charles Glover and M &A Trucking, LLC in the Superior Court, Bergen County. A copy of the complaint is attached as **Exhibit A**; a copy of the answer is attached as **Exhibit B**.

2. The plaintiff is a citizen of the State of New Jersey and was a citizen of the State of New Jersey when this action was started in state court.

a. Young Su Choi is (and was) a citizen of the State of New Jersey.

3. The defendants are citizens of a state other than the State of New Jersey and were citizens of a state other than the State of New Jersey when this action was started in state court.

a. Charles Glover is (and was) a citizen of the State of Maryland.

b. M&A Trucking, LLC is (and was) a limited liability company, the sole member of which is Melvin Robles.

i. Melvin Robles is (and was) a citizen of the State of Maryland.

c. John Does 1–10 are fictitious names the citizenships of whom are disregard. *See* 28 U.S.C. § 1441(b)(1).

d. ABC Corp. 1–10 are fictitious names the citizenships of which are disregard. *See* 28 U.S.C. § 1441(b)(1).

4. Plaintiff Young Su Choi demands damages of \$1,050,000 exclusive of interest and costs, which demand first was set out in a paper dated May 3, 2022.

5. This court has subject matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and

when it was started in state court—is between citizens of different states and the amount in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the district courts of the United States have original jurisdiction that is brought in a state court.

7. All defendants join in the removal of this action to this court.

Dated: New York, New York
May 4, 2022

A handwritten signature in black ink, reading "Charles D. Cole, Jr.", written over a horizontal line.

Charles D. Cole, Jr.
Newman Myers Kreines Harris
Attorneys for Defendants Charles Glover (sued as
Charles Mack) and M & A Trucking, LLC